

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-mj-8159-BER

UNITED STATES OF AMERICA

v.

TIMOTHY E. MARIS,  
Defendant.

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**CRIMINAL COVER SHEET**

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? No.
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No.
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No.
4. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No.

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

By: s/Gregory Schiller

Gregory Schiller  
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## UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

TIMOTHY E. MARIS

Case No. 24-mj-8159-BER

Defendant(s)

FILED BY TM D.C.

Apr 3, 2024

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - WPB

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Sept 21, 2023; Jan 31, Feb 2 & 13, Mar 18 2024 in the county of Palm Beach in the  
Southern District of Florida, the defendant(s) violated:

*Code Section*

18 U.S.C. § 1466A

*Offense Description*

Distribution of a visual depiction of any kind, including a drawing, cartoon, sculpture, or painting, that depicts an image that is, or appears to be, of a minor engaging in graphic bestiality, sadistic or masochistic abuse, or sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex, and lacks serious literary, artistic, political, or scientific value.

This criminal complaint is based on these facts:

See attached Affidavit by HSI Special Agent Elvis Medina.

☒ Continued on the attached sheet.ELVIS MEDINA Digitally signed by ELVIS MEDINA  
Date: 2024.04.03 12:58:55 -04'00'

Complainant's signature

HSI Special Agent Elvis Medina

Printed name and title

Subscribed and sworn to before me in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone (FaceTime).Date: 04/03/2024Digitally signed by Bruce  
Reinhart  
Date: 2024.04.03 14:43:51  
-04'00'

Judge's signature

City and state: West Palm Beach, Florida

United States Magistrate Judge Bruce E. Reinhart

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Elvis Medina, being duly sworn, hereby depose and state as follows:

**I. INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent (“SA”) with the Department of Homeland Security (DHS) Homeland Security Investigations (“HSI”) and have been since 2016. I am currently assigned to the HSI Office of the Assistant Special Agent in Charge West Palm Beach, Florida, which targets individuals involved in the sexual exploitation of children and other manners of commercial sex trafficking. As part of my duties and responsibilities, I investigate crimes involving the sexual exploitation of minors including coercion and enticement of minors to engage in illicit sexual activity, in violation of 18 U.S.C. § 2422(b), the production, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251(a), 2252(a) and 2252A, and the production, distribution, receipt in obscene material of a child, in violation of 18 U.S.C. § 1466A.

2. I am submitting this affidavit in support of a criminal complaint and arrest warrant for Timothy E. Maris (“MARIS”), year of birth: 1996, social security number: XXX-XX-2298. I submit there is probable cause to believe that beginning at least on or about September 21, 2023, and continuing through on or about February 13, 2024, in the Southern District of Florida and elsewhere, MARIS distributed of a visual depiction of any kind, including a drawing, cartoon, sculpture, or painting, that depicted an image that was, or appeared to be, of a minor engaging in graphic bestiality, sadistic or masochistic abuse, or sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex, and lacks serious literary, artistic, political, or scientific value in violation of 18 U.S.C. § 1466A.

3. I have not included in the affidavit each and every fact known to me about the matters set forth herein, but only those facts and circumstances that I believe are sufficient to

establish probable cause for the attached tracking warrant. The statements contained in this affidavit are based upon my investigation, information provided by other sworn law enforcement officers and on my experience and training as a federal agent and the experience and training of other federal agents.

## **II. PROBABLE CAUSE**

4. In March of 2023, a Homeland Security Investigations (HSI) West Palm Beach (WPB) undercover Special Agent (herein referred to as “the UC”) acted in an undercover capacity online on the mobile messaging application “Kik” to detect and investigate violations of federal law related to the sexual exploitation of children. The UC assumed the persona of a 28-year-old female with an 8-year-old daughter, herein referred to as Child1. The UC was monitoring numerous chatrooms including those created for individuals to discuss their interests in “taboo” sex, family incest, child pornography, and the like, to combat the sexual abuse of child and distribution of child pornography.

5. On March 21, 2023, at approximately 1030 A.M., the UC received a private message from Kik user “funj1007” (display name “John K”), later identified as Timothy E. MARIS. The user stated that he was from Palm Beach, Florida and asked the UC if she was a mother, if she had “any limits”, and if she was an “open mom.” He stated that he was “looking for a daughter to have lots of fun with.” He added that he was from Royal Palm Beach, recently moved from Boca Raton, was 29 years old, and worked in real estate. MARIS sent a “live photo”<sup>1</sup>

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<sup>1</sup> When Kik users take and send a new photo or video using the camera within the Kik application rather than an old/already-existing photo or video, the Kik application adds the word “Camera” under the photo or video that the Kik user sent. If a Kik user receives a photo or video from someone and it says “Camera” underneath it, the Kik user knows that the photo or video was just taken in real time. Kik users often request live photos or videos from one another to prove that the other user is a “real” person.

showing the intersection he was driving through at Benoist Farms Rd (in the Royal Palm Beach area) to prove he is from the local area.

6. On the same date, the UC asked if MARIS cared about age, to which he said, “Not at all.” The UC informed him that her daughter was 8 years old. MARIS asked the UC what she wanted him to do, how “far” she wanted him to go, and if this would be a “one time or long term” thing. Without answering the question, the UC asked MARIS what he would like to do and how he would go about things. The UC advised MARIS it would be the UC choosing who would be with Child1 and the UC advised that she does not want to risk any danger or pain to Child1. MARIS responded, “Well obviously we need to start things off slow. And work our way into things. Not just jam stuff right away first time. Also need to work with her to be comfortable to try new stuff. So start by spending time together and when it starts, day one do bare minimum, next day go a bit more, and so on and so forth until we reach a place where everyone is happy with the situation.”

7. MARIS sent the UC a photo of himself. The photo depicted a white male with brown hair, shirtless, wearing black pants and sneakers. The photo was taken in the reflection of a mirror in a locker room. The camera flash is covering his face.

8. Throughout the months of February through August 2023 MARIS repeatedly re-initiated contact with the UC and tried to set up a meeting with the UC where they could meet in person and discuss his plans with Child1. At one point among others, in April, MARIS stated, “I think you should let me come over. Even if she’s asleep. To see her and also talk. And maybe give her an unexpected sleeping ‘shower’ lol”.

9. On September 21, 2023, at about 1:06 P.M., MARIS responded by sending an image of cartoon child pornography. The image depicted a small, fully nude white juvenile female

who appeared to be under 12, laying on her stomach on a bed, while a large, nude adult white male straddles over her from behind with one arm wrapped around her body while penetrating her vagina with his penis. The UC commented about the picture: “He’s so big compared to her I like it”.

10. On September 22, 2023, at about 11:57 A.M., MARIS replied to the UC’s comment from the day before and about the picture: “It’s just like me and [Child1].” MARIS then told the UC that she should show him “more of [Child1]”. The UC told MARIS that he could have seen Child1 for himself. MARIS responded, “I’m still working towards that. What are you doing tomorrow?”

11. On November 11, 2023, at approximately 3:46pm, the UC received a private message on Kik from username “funj1902”, later identified as MARIS. The profile picture was of a red Panda Express fountain drink cup. After providing information to prove their were each other, MARIS advised, “Yes. My old account got deleted. I thought you did it”. On November 27, 2023, at about 9:18am, MARIS messaged the UC again and stated, “Just imagine coming home every day from work and you just see me on the couch with [Child1] on top being filled up. Welcoming you home”.

12. After several more discussions, the UC and MARIS met at a Dunkin Donuts in West Palm Beach, FL on December 7, 2023, at about 12:49 pm. The UC was clearly able to positively identify the male as MARIS. The UC said “Hi. John?” MARIS stopped walking and started to blade his body away as if he was about to leave. The UC told him that she was [UC First Name]. MARIS then approached the UC. They shook hands and said it was nice to meet each other. The UC observed that MARIS was obviously nervous, as he was shaking, breathing heavily,

looking around into the parking lot, and also looking at the UC up and down as if he were looking for anything pointing to this being a law enforcement operation.

13. MARIS stated, "This is all I'm good for right now." The UC asked if he wanted to talk at all, and that it was small inside of the Dunkin Donuts so it was probably better to talk outside. MARIS said, "Uh..." The UC told him that she was nervous also, and that there were seats outside with nobody around. MARIS said no, and "I just wanted to show you that I'm real." MARIS again said that he just wanted to have an initial meet to show each other that they were "real" and then they could talk more. The UC asked him if he was a painter since there was paint all over his shoes. He said, "Yeah, for today." MARIS took a deep breath and said that he was going to go before he "loses his mind." He said that they would just message on Kik for now.

14. Surveillance units observed MARIS walking northbound and then sprinting towards a red BMW sedan, bearing Florida (FL) license plate number IU5-662, enter the driver side door of the vehicle, and sped away. MARIS was the sole occupant of the vehicle. A Florida Department of Motor Vehicles check was conducted on FL license plate number IU5-662. FL license plate number IU5-662 is assigned to a red 1986 BMW, registered to MARIS at 167 Forester CT., Wellington, FL 33414.

15. At about 12:53pm, MARIS messaged the UC on Kik again and said, "Sorry for not staying. Just super nervous out in public. Heart racing and all that. Have a lot to lose". At about 1:08pm, he wrote, "So you trust me more now?" The UC told him that she did and asked if he trusted her more now too. MARIS wrote, "Yeah. But we need to talk about a plan now". The UC said that was what she thought they were going to do today in person. MARIS asked the UC, "How much have you done with her?" (referring to Child1). He also asked why the UC does not have

sex. The UC wrote back that she has had many bad experiences with men and that she is not into men that much anymore. At about 1:23pm, MARIS wrote, "Ok I get it. I'm not like that btw. But think about it. Wouldn't you wanna suck the dick that's been in your daughter?" The UC told him that she would watch. MARIS said, "Idk. You're pretty attractive. We might start something all 3 of us. Imagine all snuggled up with nothing but blankets. All 3 in bed". The UC said that this was not really her plan and asked him not to push her. She then told him that if he changed his mind about the UC and Child1, to just let her know and that it was okay. MARIS said, "I didn't change my mind. I just got too nervous out in public I couldn't stay. Watched too many bad things happen". He then asked the UC how she plans to introduce him to Child1.

16. On December 8, 2023, MARIS messaged the UC on Kik stating that he owns a construction company. He also stated that he feels more comfortable now knowing that the UC is real. Shortly after, he sent a video of adult pornography depicting a white male and white female engaged in sexual intercourse. The UC asked him what his favorite kind of porn is. He wrote, "Well I love bdsm. Bondage, sub/dom, forced. Stepdaughter and mother. And you know the other one."

17. From December through February, MARIS continuously re-initiated contact with the UC and tried to set up a meeting with the UC where they could meet in person for him to engage in sex with Child1. When discussing the UC's concern that MARRIS would have to be careful when engaging in sex with Child1, MARRIS responded, "Yeah I know obviously. But let's do raw since I'm clean and I'll be careful. And it'll be smoother and easier for her". He added regarding sex with Child1: "So we can kiss and undress, I'll rub and lick her, and then teach her how to suck". He then asked the UC what position he should start in with Child1, and asked if they



should put Child1 in lingerie. The UC asked him where he wanted to ejaculate on Child1, and where they would find lingerie small enough to fit her. MARIS said, “Idk. Online probably. I’d lose it if she had some fishnets on. It would be amazing to finish inside but idk how you feel about that”. The UC said that he could finish inside of Child1 if he wore a condom, but if not, he had to pick somewhere else. MARIS replied, “In her mouth then so she can swallow. We need to get her addicted to my cum as soon as possible.” The UC reminded him, “This is her first so she may not be the best swallower yet”.

18. MARIS expressed concern at meeting at his residence, or at hotel due to security camera. On January 31, 2024, at about 3:06pm, after the UC told MARIS that Child1 had been sick, MARIS said, “...When do you think it will be good enough for me to come over?” At the same time, he sent a computer-generated image depicting child sexual abuse material. The image portrayed a white, pre-pubescent juvenile who was fully nude while standing in front of an adult male’s penis. There appears to be semen on the child’s face, chest, and stomach, and semen dripping from the male’s penis. The following text is written on the image: “Daddy...”

19. At about 3:29pm, MARIS sent a second computer-generated image depicting child sexual abuse material. This image depicted a fully nude adult white male standing on blankets, with a fully nude white, pre-pubescent female standing in front of him. The adult male’s penis is erect, and the female child is licking the male’s penis.

20. The UC responded that maybe they could plan for him to come over on Valentine’s Day (February 14, 2024) so that Child1 could have a special Valentine’s Day. MARIS asked if she would take off of work. The UC said she would take the day off from work and keep Child1 home from school.

21. On February 2, 2024, at about 9:17am, MARIS responded, “I’m excited”. At about 9:59am, stating, “This is what I want with you”. At that time, he sent two computer-generated images of child sexual abuse material. The first image depicted a clothed adult white male sitting on a bed with his erect penis exposed from his pants. A white female juvenile is kneeling on the ground while performing oral sex on the male. At the same time, an adult white female in lingerie is sitting on the bed while kissing the adult male. The second image depicts a fully nude adult white female laying on her back while holding what appears to be a fully nude white female child who is straddle over her. At the same time, a fully nude adult white male is penetrating the child with his erect penis.

22. On February 13, 2024, between 9:04am and 9:13am, MARIS sent the UC two computer-generated images and one video. The first image depicted a pre-pubescent female who was topless and wearing a short skirt. Her arms were being held behind her back while she was being penetrated by a male’s penis. The second image depicted a juvenile female laying on her back while wearing a blue tank top or bra, and blue underwear. Her wrists were being held down by a nude, adult male as he his penis was placed inside of the child’s mouth. The video was approximately eighty-three seconds long and depicted a fully nude, pre-pubescent female straddled over a fully nude, adult male. The child performed oral sex on the adult male as he held her head with both hands while thrusting in her mouth. The adult then laid behind the child while penetrating her vagina with his penis, while also holding one of her legs up. The male then laid on his back, straddled the child above him, and continued to penetrate her vagina has he held his hands around the child’s neck. The video contained audio of the child while being penetrated.

23. MARIS fell through on his promise to meet on the 14<sup>th</sup>. One week after the planned February 14, 2024, MARIS reengaged in contact with the UC via Kik. Since then, he has remained in regular contact with the UC regarding meeting to have sexual relations with Child 1.

24. On March 3, 2024 at about 12:33pm, MARIS messaged the UC on Kik stating, “When I stay over she’s going to be staying up all night being used as a cock sleeve and a sex toy and a cum dump.” At about 3:29pm he wrote, “When we’re a couple times into it I’ll be expecting a key from you. And yes, middle of the night coming in, and using my property to wrap around and milk my cock at whatever time I want, stretching her and using her as a piece of fuck meat, asleep or awake, to unload my cum into that super tiny thirsty mouth. I really don’t know who’s gonna be more helpless. You in the corner watching and touching yourself wishing it was you or her pinned down wondering how much bigger and harder is gonna be and how much longer daddy is gonna be able to go for”.

25. On March 5, 2024, MARIS asked the UC when she was sexually active, what was she into? The UC stated that she was not going to discuss that with him as this was not about her, and that he is “stringing us along”. She also told him that she has been talking to someone else who is more serious and reliable about Child1. MARIS insisted that that was not happening, and that this other person would not “go through”.

26. on March 12, 2024, at about 9:41am, the UC received a private message from Kik username **funj1904**. The profile photo was the same profile photo MARIS had used at times on previous accounts, to include his last profile photo on funj1902, depicting him shirtless on a boat. Kik showed that this new account funj1904 had been on Kik for “1 day”. The user wrote, “Did

you report my account?” The UC went to message funj1902 and realized that the account was no longer working and she could not message it.

27. On March 18, 2024, at about 10:54am, MARIS sent the UC a computer-generated image of child sexual abuse material, along with a message stating, “Would you dress up with [Child1] and make her feel special?” The photo depicted a fully nude adult white male kneeling on a bed with a fully nude, very young white female child straddled around him ,with her arms and legs wrapped around him. She is wearing purple animal ears, animal feet, and an animal tail. The adult male is penetrating her while an adult female dressed in lingerie is kneeling behind him and kissing his cheek. MARIS then asked if Child1 has school this week. The UC informed him that she did not, as it was spring break. He asked if Child1 was at home with the UC, and stated that he was working but was tempted to take off of work.

28. On March 19, 2024, at about 9:19am, MARIS messaged the UC again and stated, “Would you walk outside with [Child1] when I tell you to?” The UC asked what he meant. He stated that when he comes to see them, would the UC and Child1 walk out of the front door so that he can see them both “to make sure you guys are there and waiting for me”. The UC said she would.

29. MARIS is still in communication with the UC as of April 2, 2024.

30. In March 2023, HSI served a summons to Kik for subscriber information for the user account funj1007 (display name “John K”). Kik provided that the account was created on or about February 1, 2023, was being operated on an iPhone, and with an unconfirmed email address associated to the account was Jkingrico@aol.com. Kik also provided the user’s Internet Protocol (IP) activity log. A common recurring IP address on the user’s IP activity log was 73.0.227.65.

31. A second summons to Kik in August 2023, produced the same results, but included an additional unconfirmed email of tim\_maris@yahoo.com. A common recurring IP address on the user's IP activity log still 98.249.160.134.

32. A third summons to Kik in November 2023, for the funj1092 account revealed that the account was created on or about September 26, 2023, was being operated on an iPhone, and with an unconfirmed email address associated to the account was jamesking7137@aol.com. Kik also provided the user's Internet Protocol (IP) activity log. A common recurring IP address on the user's IP activity log still 98.249.160.134.

33. Comcast responded to a summons for records for IP address 73.0.227.65 and IP address 98.249.160.134, providing the IP addresses were dynamically assigned to subscriber "E.M." at an address in Wellington, FL 33414, service state date of December 11, 2020. In fact, MARIS' mother is E.M.

34. Florida Department of Motor Vehicles and Driver's Licenses Database records revealed a white male named Timothy Etienne MARIS (DOB 11/21/96) with an attached driver's license photo. This photo matched the photo MARIS had sent to the UC of himself through Kik.

35. The online publicly available social networking account on LinkedIn listed Maris' employment as an Assistant Manager – Office Assistant at PGA Property Limited (his mother's company) only as recent as April 2023, but this profile is no longer available. His mother is a realtor with numerous rental properties.

### **III. CONCLUSION**

For these reasons, your Affiant respectfully submits that there is probable cause to believe that Timothy E. Maris violated 18 U.S.C. § 1466A within the Southern District of Florida and

elsewhere by distributing of a visual depiction of any kind, including a drawing, cartoon, sculpture, or painting, that depicted an image that was, or appeared to be, of a minor engaging in graphic bestiality, sadistic or masochistic abuse, or sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex, and lacks serious literary, artistic, political, or scientific value. I therefore respectfully request that the Court authorize a criminal complaint and arrest warrant for Maris.

Respectfully submitted,

ELVIS MEDINA Digitally signed by ELVIS MEDINA  
Date: 2024.04.03 13:00:05 -04'00'

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Elvis Medina  
Special Agent  
Homeland Security Investigations

Subscribed and sworn to me by applicant by telephone (Facetime) per the requirements of Fed. R. Crim. P. 4(d) and 4.1 on this 8th day of April 2024.



Digitally signed by Bruce  
Reinhart  
Date: 2024.04.03 14:44:16  
-04'00'

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HON. BRUCE E. REINHART  
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** TIMOTHY E. MARIS

**Case No:** 24-mj-8159-BER

Counts #1-5:

Distribution of Obscene Material of a Minor

18 U.S.C. § 1466A

\* **Max. Term of Imprisonment:** 20 years

\* **Mandatory Min. Term of Imprisonment (if applicable):** 5 years

\* **Max. Supervised Release:** Life (mandatory minimum term of 5 years)

\* **Max. Fine:** \$250,000 fine and a \$5,000 special assessment

\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.